

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Abimbola Folaranmi

Case: 2:21-mj-30489

Assigned To : Unassigned

Assign. Date : 10/16/2021

Case No.

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2021 through the present date in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1341	Mail Fraud
18 U.S.C. § 641	Theft of Government Funds
18 U.S.C. § 1028A	Aggravated Identity Theft

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.

October 16, 2021

Date: _____

City and state: Detroit, MI
Complainant's signature

Special Agent Elizabeth Weitzel

Printed name and title



Judge's signature

David R. Grand, U.S. Magistrate Judge

Printed name and title

Save

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AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Elizabeth Weitzel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Department of Labor, Office of Inspector General, Labor Racketeering and Fraud (**DOL-OIG/OI-LRF**). I have been employed within the DOL since May of 2021. Prior to this assignment, I was a Special Agent with the United States Department of Housing and Urban Development Office of Inspector General (HUD-OIG) for over 11 years. I am currently assigned to the Detroit Field Office of (DOL-OIG). I have conducted numerous criminal investigations involving Single-Family Housing Loan Origination Fraud, Home-Equity Conversion Mortgages, Public and Indian Housing Project Based Vouchers, Public Corruption, Identity Theft, Fugitive Felon cases and financial and unemployment insurance fraud schemes. I was previously assigned to the Southeast Michigan Financial Crimes Task Force with the Michigan State Police and U.S. Secret Service where I conducted and led complex joint investigations pertaining to numerous violations of law relating to mortgage fraud and other financial crimes with other state and federal investigators. I have conducted and/or

assisted on numerous search and arrest warrants related to these violations. I have additional experience and training from the Federal Law Enforcement Training Center (FLETC) in the investigation of criminal activity, economic crimes, and identity theft. I am an “investigative or law enforcement officer” of the United States within the meaning of Title 5, U.S.C. § 8401(17)(A)(i)(I).

2. Prior to my employment with HUD OIG, I was a Corporate Investigator and Bank Officer with Fifth Third Bank from July of 2006 until March of 2010. As a Corporate Investigator with Fifth Third Bank, I investigated cases involving mortgage fraud, wire fraud, consumer-loan fraud, counterfeit-check, identity theft, embezzlement, bank robberies, and various financial institution fraud.
3. As a Special Agent at the Department of Labor, I have conducted investigations into criminal violations of Title 29 and Title 18 of the United States Code. During this time, I have become familiar with and worked with Special Agents who have over 30 years of law enforcement experience investigating criminal schemes targeting the State of Michigan’s **(SOM)** Unemployment Insurance Agency **(MUIA)** through the filing of false fictitious Unemployment Insurance **(UI)** Claims. Based on my direct personal experience with these cases, I have become familiar with the

methods that criminals use to attack and exploit the UI systems as well as tools and methods criminals often utilize to facilitate the fraud. More recently, this type of fraud surrounds Pandemic Unemployment Assistance (PUA) claims that are a type of UI claim.

4. As a result of my participation in this investigation, I submit that there is probable cause to believe that **ABIMBOLA FOLARANMI** has committed federal crimes, including wire fraud (18 U.S.C. § 1343) mail fraud (18 U.S.C. § 1341), theft of government funds (18 U.S.C. § 641) and aggravated identity theft (18 U.S.C. § 1028A).
5. I make this affidavit based upon personal involvement in the subject criminal investigation, in the subject criminal investigation, including the review of financial records, law enforcement intelligence databases, records from law enforcement interviews, and law enforcement surveillances. I have also been provided information from the Federal Bureau of Investigation (**FBI**). This affidavit does not contain all of the facts developed to date in the underlying investigation and is being submitted for the purpose of establishing probable cause to secure a criminal complaint and arrest warrant.

SUMMARY

6. This is a joint investigation conducted by the FBI, DOL-OIG/OI-LRF, and the Birmingham Police Department located in Birmingham, Michigan.

The investigation of this matter has revealed that **ABIMBOLA FOLARANMI** using the alternate names of STEVE BRIGGS and RICHARD KILEY, is involved in executing a scheme to defraud the U.S. government by fraudulently obtaining unemployment insurance (UI) benefits issued by multiple state workforce agencies in various victims's names. **ABIMBOLA FOLARANMI** under the alternate identity of RICHARD KILEY, developed a relationship with an FBI **SOURCE** through an internet-dating site Zoosk. **ABIMBOLA FOLARANMI** directed proceeds of those fraudulent UI claims to the FBI **SOURCE**'s bank account, and requested the FBI Source to convert the funds to cash and move the money out of State through the mail contrary to wire fraud (18 U.S.C. § 1343), mail fraud (18 U.S.C. § 1341), theft of government funds (18 U.S.C. § 641) and aggravated identity theft (18 U.S.C. § 1028A).

UNEMPLOYMENT INSURANCE BACKGROUND

7. The Social Security Act of 1935 initiated the federal and state unemployment insurance system. The system provides benefits to

individuals who are unemployed for reasons beyond their control. The purpose of the UI system is twofold: first, to lessen the effects of unemployment through cash payments made directly to laid-off workers, and second, to ensure that life necessities are met on a weekly basis while the worker seeks employment. In the State of Michigan, the UI system is administered by the Unemployment Insurance Agency.

8. State unemployment systems and benefits are joint state and federal enterprises largely financed by taxes on private employers located in that state. As of the time of this application, the federal government is providing significant supplemental benefits to the states as a result of the COVID-19 pandemic. Beginning in or about March 2020 and continuing through the present, the Families First Coronavirus Response Act (**FFCRA**); Coronavirus Aid, Relief, and Economic Security (**CARES**) Act; and American Rescue Plan Act of 2021 (**ARPA**) have created federal programs that allowed for the significant outlay of federal funds flowing to and through the states to offset the historic need for unemployment benefits by the American workforce. That is all to say, the recent federal legislation allowed for a significant outlay of federal funds to flow through the states to offset the recent and historic need of the American workforce for unemployment benefits as a result of the COVID-19 Pandemic, including

the American workforce in the SOM and in the Eastern District of Michigan (EDMI). Collectively and colloquially, the funds flowing from these programs have come to be known as Pandemic Unemployment Assistance (PUA).

9. Normally (in the absence of fraud), an unemployed worker initiates an unemployment claim (UI claim). This can be accomplished by submitting a claim in person, over the telephone, or on the Internet. Currently, most UI claims are filed online through a State Workforce Agency (SWA) website. In order to be eligible for UI benefits, the worker must demonstrate a certain level of earnings in several quarters immediately preceding the application. The amount of unemployment benefits that a UI claimant might be eligible for depends on a variety of factors, including, but not limited to, the length of his or her previous employment and the amount of wages he or she earned.
10. The SWA will approve or reject a UI claim based on the application and information provided by the claimant. If the SWA approves a UI claim, the claimant is required to re-certify the claim via telephone or Internet, at various times throughout the claim process. The claimant must also certify that he or she is still unemployed and actively seeking work.
11. To prevent and otherwise inhibit fraud, the SWAs capture certain data

surrounding the interaction between an individual and the UI system. Each time a claim is accessed in the system, it creates a digital footprint.

Although states utilize their own unique systems, many times the data that is collected includes the dates, times, Internet Protocol (IP) addresses, and Media Access Control (MAC) address associated with a device accessing a claim. The SWA systems tie this information to the user-entered information captured to facilitate the claim (i.e., name, address, social security number, BOA or other bank account numbers, banking routing numbers, etc.). It is through analysis of this data that the SWAs and investigating agents can identify fraudulent trends and tendencies associated with certain claims.

12. According to data maintained by the U.S. Department of

Labor—Employment and Training Administration, SWAs requested and received approximately \$427 billion in CARES Act funding related to **PUA**, Federal Pandemic Unemployment Compensation (**FPUC**) and Pandemic Emergency Unemployment Compensation (**PEUC**) benefit payments. In total, it is estimated that as of September 2021, the federal government's response to the COVID-19 pandemic will have included approximately \$872.5 billion in pandemic related UI funding for SWAs to administer for individuals who have been impacted by COVID-19.

- 13.Regardless of which of the three programs described above was involved (that is, whether PUA, PEUC, or FPUC), funds were distributed to program participants by [SWA]. These funds were received by [SWA] from the United States Department of the Treasury (Treasury) through Treasury's program entitled Automated Standard Application for Payments, commonly referred to as "ASAP." ASAP is an electronic system that federal agencies use to securely transfer money to recipient organizations. Federal agencies enroll recipient organizations, authorize their payments, and manage their accounts. Recipient organizations then request payments from these pre-authorized accounts. Recipient organizations may include state and local governments, educational and financial institutions, vendors and contractors, profit and non-profit entities, and Indian tribal organizations. ASAP is free for both federal agencies and recipient organizations.
- 14.For the programs described above, the recipient organizations were/are various SWAs. An SWA participating in these programs has an account in ASAP, from which it may draw funds to make payments to individual recipients. Before being able to draw down those funds, the funds must first be placed in the SWA's ASAP account. Federal agencies use Treasury's asap.gov site to self-create and fund the SWA's ASAP account.

15. When the SWA for which the account was funded was ready to receive the funds, the SWA would make a payment request using the ASAP web interface, and Treasury would then disburse the funds to the SWA's bank account for the SWA's use. The flow of funds from the ASAP account to the SWA's bank account always occurs in one of two electronic payment methods: an Automated Clearinghouse payment, commonly referred to as an "ACH," or by another electronic service operated by the Federal Reserve Bank (FRB) system called Fedwire. Whether the flow of funds from the ASAP account to the SWA's bank account was done by ACH or by Fedwire, there are certain steps along the way that need to occur.
16. The origin of the payment to the SWA's bank account from the SWA's ASAP account originates from wherever the SWA made the request for payments, which generally occurs wherever the SWA is located. Once the SWA makes this request, the Treasury Web Applications Infrastructure (commonly referred to as the TWAI) routes the funds through one of two Operations Centers, either the Dallas Operations Center (DOC) located in Dallas, Texas, or the East Rutherford Operations Center (EROC) located in East Rutherford, New Jersey. The payment path always includes routing through one of these two centers for processing.
17. After that, the payment path then goes to one of four different locations, depending on the type of payment being made. If it is an ACH payment, the payment generally passes through the ACH Clearinghouse, also known as The Clearing

House, in Atlanta, Georgia. The ACH Clearinghouse is an organization that clears ACH payments, whether for the government, individuals, or commercial entities, and is unrelated to the ASAP program. ASAP payments are handled by the ACH Clearinghouse as any other ACH payments are handled. The ACH Clearinghouse has a backup system, in the event that the system in Georgia becomes unavailable due to system maintenance, disaster or other reasons. This backup facility is located in Minneapolis, Minnesota. While the majority of ASAP ACH payments flow through Atlanta, those that do not necessarily flow through Minneapolis instead.

18. Alternatively, if the ASAP payment is being made as a Fedwire payment, the payment path typically passes through the FRB New York's Clearinghouse, located at the EROC in New Jersey. The FRB New York's Clearinghouse clears Fedwire payments for government and commercial entities, and is unrelated to the ASAP program. ASAP payments are handled by the FRB New York's Clearinghouse as any other Fedwire payments are handled. The FRB New York's Clearinghouse has a backup system, in the event that the system in New Jersey becomes unavailable due to system maintenance, disaster or other reasons. This backup facility is located at the DOC in Dallas, Texas. While the majority of ASAP ACH payments flow through EROC in New Jersey, those that do not necessarily flow through the DOC in Texas instead. Regardless of whether the

ASAP payment was made by ACH and flowed through Atlanta, Georgia (or through Minneapolis, Minnesota), or whether the payment was made by Fedwire and flowed through the EROC in New Jersey (or through the DOC in Texas), the funds then flow to the SWA's bank account. It is at this point the SWA has access to the ASAP funds for distribution to program participants, and Treasury's involvement regarding these funds ceases. Whether the SWA's bank account is located in the same state as the SWA or elsewhere, the funds would have necessarily flowed through the facilities described above prior to arriving in the SWA's bank account.

PROBABLE CAUSE

19. Based upon my training and experience, my participation in fraud investigations, and discussions with past and present state and federal investigators about fraud schemes and investigations, I know that common practices of fraud scheme perpetrators include the following:
- a. A fraud scheme perpetrator will often times use an alternate identity to conceal his or her true identity;
 - b. A fraud scheme perpetrator will, under cover of an alternate identity, develop personal relationships with unsuspecting third parties, primarily through a combination of internet chat/dating sites and telephone contacts;

- c. A fraud scheme perpetrator will seek the use of bank accounts owned by unsuspecting third parties, and direct the proceeds of fraudulent activities into those accounts, either electronically, or by sending cash, checks, or money orders to unsuspecting third parties through the mail. The perpetrator will necessarily communicate to the unsuspecting third parties that the funds are from a legitimate source.
- d. A fraud scheme perpetrator will coordinate one or more financial transactions with unsuspecting third parties in order to conceal the source, nature and location of the fraudulent proceeds. Such transactions include various types of deposits, withdrawals and negotiable instruments. The transactions are typically conducted electronically or through the use of the mail.
- e. A fraud scheme perpetrator recruits money mules to help launder proceeds derived from online scams and frauds. Money mules add layers of distance between crime victims and criminals, which make it harder for law enforcement to accurately trace money trails. “A Money Mule is someone who transfers or moves illegally acquired money on behalf of someone else.”

- f. A fraud scheme perpetrator involved knowingly facilitates unemployment insurance (**UI**) fraud by receiving and/or sending money UI benefits that were issued in the names of other individuals.
- g. The goal of the UI Money Mule scheme is to fraudulently obtain federal/ state UI funds, which are administered by state workforce agencies. In general, such scams are initiated when bad actors falsely represent themselves as someone else in order to fraudulently collect UI benefits. Once a fraudulent UI claim is made payable, the funds are often sent to a predetermined beneficiary bank account. Often times, the individual that filed the fraudulent UI claim will use a beneficiary bank account of a third party, “Money Mule” to facilitate the scheme.

INTRODUCTION

20. In March of 2021, a Detective with Grosse Pointe Park Public Safety Department contacted Birmingham Police Department and subsequently the FBI to report on-going suspicious activity. According to the Detective, an unidentified suspect (later identified by law enforcement as **SOURCE**) received large volumes of mail from various states Unemployment Agencies

to residence 895 Harmon, Birmingham, MI, 48009.

21. On 05/13/2021, I obtained from DOL-OIG Assistant Special Agent in Charge James Mead the following documents: Grosse Pointe Park (GPP) Public Safety Department report #21-1364, Charissa Hutchinson's Statement for Grosse Pointe Park Public Safety Department report #21-1364, dated 03/09/2021, A.K. witness statement, and six supporting photographs pertaining to the initial complaint of mail being sent from various states Unemployment Agencies to residence 895 Harmon, Birmingham, MI, 48009.

Grosse Pointe Park (GPP) Public Safety Department Report #21-1364

22. A review of GPP Public Safety Police report #21-1364 revealed that on 03/09/2021, Detective SGT. Narduzzi interviewed Charrisa Hutchinson in the GPP lobby located at 15115 E. Jefferson, Grosse Pointe Park, MI, 482330.

- a) Hutchinson advised that on 01/31/2021, Hutchinson applied for a part time job through American University, which she is an alum of.
- b) Hutchinson reported that on 02/02/2021, she received notification she was hired by "Samaritans Purse" and was instructed to send them information on 5 charities, which she did on 02/07/2021.

- c) Hutchinson reported that she was advised her charities information was entered into a data base and a donation would be sent to her and would arrive to Hutchinson on 03/01/2021.
- d) On 03/03/2021, Hutchinson received a check in the amount of \$3,600.00. Hutchinson was given instructions to cash the check, keep \$300 for herself as payment, and withdraw the remaining \$3,300.00 in cash.
- e) Hutchinson further advised she was instructed to take the remaining \$3,300.00 in cash, place the cash in a book/novel, wrap the book like a gift and FedEx it overnight to RICHARD KILEY at 895 Harmon, Birmingham, MI.
- f) Hutchinson advised that after she shipped the wrapped book with the \$3,300.00 in cash to RICHARD KILEY at 895 Harmon, Birmingham, MI, she was informed by her bank the check was fraudulent, and she was out \$3,300.00.

23.A review of GPP Public Safety Police report #21-1364 revealed that on 03/18/2021, Detective SGT. Narduzzi went to the residence at 895 Harmon. There was no one present at the residence.

- a) Detective SGT. Narduzzi's investigation revealed that Kristy and Bruce Barrett are the owners of 895 Harmon and live next door at 915

Harmon.

- b) Detective SGT. Narduzzi knocked on the door of 915 Harmon. Kristy Barrett answered the door and confirmed she and her husband Bruce Barrett own 895 Harmon and they rent it out.
 - c) Kristy Barrett indicated she knows something is going on at 895 Harmon and recently a book with money in it was inadvertently sent to her house 915 Harmon.
 - d) Kristy Barrett further advised her tenant A.K. knows more about suspicious happenings at 895 Harmon.
 - e) Kristy Barrett then called A.K. on the phone and Detective SGT. Narduzzi briefly spoke with A.K.
 - f) A.K. agreed to come to Kristy Barrett's house 915 Harmon to further talk with Detective SGT. Narduzzi.
24. A review of GPP Public Safety Police report #21-1364 revealed that on 03/18/2021, Detective SGT. Narduzzi interviewed A.K.
- a) A.K. further stated that he rents 895 Harmon from the Barrett's.
 - b) A.K. advised that he sub rents a room to **SOURCE**.
 - c) A.K. reported that recently three books with cash inside have been delivered to their home 895 Harmon.
 - d) A.K. asked SOURCE about the books being delivered and A.K. stated

that **SOURCE** responded to A.K. that **SOURCE** was helping some people.

- e) A.K. stated that **SOURCE** receives large volumes of mail to 895 Harmon in other people's names from various states labor departments.
- f) A.K. brought Detective SGT. Narduzzi a box of 27 letters/mail, all from the state of New York, addressed to various names, none of which are **SOURCE** but all addressed to 895 Harmon with debit/credit cards inside.
- g) A.K. stated the box of mail is the tip of the iceberg as this is just a sample of what he plucked from the incoming mail lately.
- h) Neither A.K. nor Kristy Barrett ever heard of RICHARD KILEY.
- i) Detective SGT. Narduzzi took photos of the box of mail from the New York State Labor Department.

FBI TFO'S INTERVIEW OF A.K.

25. On March 25, 2021 FBI TFO's Moschel and Whipple interviewed A.K. at the Birmingham Police Department. A.K. confirmed the information given by the Grosse Pointe Park Detective. A.K. stated that **SOURCE** never receives personal mail at 895 Harmon, and that it has only been

unemployment agency mail.

26.A.K. provided FBI TFO Whipple with mail that he/she has taken since February 2021. The box contained approximately 50 pieces of mail in different names from unemployment agencies located in New York, Nevada, California, Illinois, Arizona, and Michigan. Many pieces of mail contained credit/debit cards from the listed unemployment agencies in various names that do not or have not ever resided at 895 Harmon.

DOL UNEMPLOYMENT INSURANCE CLAIMS FILED WITH VARIOUS STATES UNEMPLOYMENT AGENCIES USING 895 HARMON

27. On or about 04/08/2021, DOL OIG ASAC James Mead conducted a search of Department of Labor records for UI benefits claims filed with the claimant address 895 Harmon, Birmingham, MI, 48009.

- a) Department of Labor records reported eight UI claims were filed with the claimant mailing address 895 Harmon, Birmingham, MI, 48009.
- b) Seven of eight UI claims were filed with the following State Unemployment Agencies; Nevada, New Jersey, and California. (See insert below.)

<u>STATE</u>	<u>CLAIMANT</u>	<u>CLAIMANT MAILING ADDRESS</u>			
<u>ID</u>	<u>INITIALS</u>				
NV	J.L	895 HARMON ST	BIRMINGHAM	MI	48009
NJ	F.K	895 HARMON ST	BIRMINGHAM	MI	48009
NJ	J.D	895 HARMON ST	BIRMINGHAM	MI	48009
NJ	F.B	895 HARMON ST	BIRMINGHAM	MI	48009
NJ	F.F	895 HARMON ST	BIRMINGHAM	MI	48009
CA	J.M	895 HARMON ST	BIRMINGHAM	MI	48009
CA	M.B	895 HARMON ST	BIRMINGHAM	MI	48009

28.The Department of Labor provided records of the UI benefits claims filed in the names of several victims, herein known as J.L. and J.M.

29.The Department of Labor provided records of the UI benefits claim filed in the name of J.L. in the State of Nevada. The claim, filed on August 5, 2020, listed J.L.'s residential address as 895 Harmon, Birmingham, MI.

FBI TFO'S INTERVIEW'S OF UI CLAIMANTS CONFIRM UI
CLAIMANTS ARE ID TEHFT VICTIMS

30.The FBI contacted victim J.L., who stated that he/she never, filed an unemployment claim nor had anyone file on his/her behalf in the State of Nevada. J.L. was unfamiliar with the Birmingham, MI address listed on the application. Likewise, J.L. did not know anyone who lived in the Eastern District of Michigan. J.L. verified that it was his/her correct social security number used to file the claim made in Nevada.

31. The Department of Labor provided records of the UI benefits claim filled in the name of J.M. in the State of California. The claim, filed on August 18, 2020, listed J.M.'s residential address as 895 Harmon, Birmingham, MI.

32. The FBI contacted J.M., who stated that he/she never filed an unemployment claim nor had anyone file on his/her behalf in the State of California. J.M. was unfamiliar with Birmingham, MI address listed on the application. Likewise, J.M. did not know anyone who lived in the Eastern District of Michigan. J.M. verified that it was his/her correct social security number used to file the claim made in California.

FBI TFO'S INTERVIEW OF SOURCE

33. On April 08, 2021, **SOURCE** was interviewed by FBI Task Force Officers (TFO) Jeffrey Whipple and James Moschel at 2000 HOLLAND STREET BIRMINGHAM, MI.

a.) **SOURCE** advised he/she began using a dating site Zoosk approximately three years ago and met a male by the name of RICHARD KILEY. KILEY and **SOURCE** have been communicating via telephone calls and text messages on a daily basis since then.

- b.) **SOURCE** advised that KILEY reported he was from Grand Rapids, MI, was an engineer, and was taking a two-week contract in Malaysia for his business, Berjaya Air. KILEY called after a few weeks and told **SOURCE** he was stranded in Malaysia and needed money to get home to Michigan. **SOURCE** withdrew \$20,000.00 cash from his/her bank account and KILEY told **SOURCE** to send the money to STEVE BRIGGS at 801 Legacy Drive Apartment #2624 Plano, Texas, 75023 who would get the money to KILEY.
- c.) **SOURCE** advised that over the course of a year he/she sent KILEY money for various business purposes for a total amount of \$100,000.00.
- d.) **SOURCE** stated that over the past few years he/she gave KILEY his/her bank account number, and that KILEY began to deposit money into the account via direct deposit. **SOURCE** reported that KILEY sometimes would send him/her a check and tell him/her to deposit it into the account; KILEY would then direct **SOURCE** to take out the amount in cash and send it to STEVE BRIGGS at 801 Legacy Drive Apartment #2624 Plano, Texas, 75023.
- e.) **SOURCE** further reported that sometimes money just showed up in his/her account and KILEY will have him/her send the money out

right away, or sometimes the money sits in the account for a while.

Other times **SOURCE** will see direct deposits into his/her bank account from various states' unemployment agencies in the names of people he/she does not know. As with previous transactions, **SOURCE** will withdraw the cash and send it in a Federal Express package to 801 Legacy Drive Apartment #2624 Plano, Texas, 75023.

f.) **SOURCE** stated that in December of 2020 he/she was sent a check from KILEY in the amount of \$15,000.00 that he/she was to deposit into his/her bank account and send a cashier's check to Diann Martinez in Utah. **SOURCE** further stated that there is no pattern on when KILEY will direct deposit unemployment funds or other cash into his/her account.

g.) **SOURCE** stated that on April 1, 2021 he/she sent a Federal Express package with \$6,500.00 in it on direction from KILEY to 801 Legacy Drive Apartment #2624 Plano, Texas, 75023.

h.) **SOURCE** stated that over the course of the past three years with KILEY, he/she has had the following bank accounts: Citizens Bank that is currently frozen, Huntington Bank that is currently frozen, Bank of America that has been closed, and JP Morgan Chase that is

currently in use over the past year, and has been used to funnel money.

- i.) **SOURCE** reported that his/her accounts with Citizens, Huntington, and Bank of America were all closed by the banks due to **SOURCE's** suspicious activity.

CONTROLLED DELIVERIES BY SOURCE

34. I reviewed FBI reports obtained from FBI TFO's Whipple and Moschel.

Between 05/10/2021 and 06/24/2021, **SOURCE** sent three packages via FedEx tracking totaling \$8,800.00 in cash to STEVE BRIGGS 801 Legacy Drive Apartment #2624 Plano, Texas, 75023. **SOURCE** was told to send the packages to the address under the direction of RICHARD KILEY.

Controlled Delivery #1 FedEx Package Tracking #7869 7720 3520

35. On 06/30/2021, I obtained from FBI TFO Whipple the following Report:

"Delivery of FedEx Pkg. #7869 7720 3520 from **SOURCE** to 801 Legacy Dr., Plano, TX drafted on 05/11/2021."

- a) I reviewed the report that documented on 05/10/2021 **SOURCE** mailed a package containing \$2,500.00 cash via FedEx to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023. The

package was given FedEx tracking #7869 7720 3520 and shipped via Priority Overnight. (On or about 05/06/2021, **SOURCE** was told via text message to send the package to the address under the direction of RICHARD KILEY.)

b) The report stated that on 05/11/2021, FedEx employee OMAR SEIKALY advised FBI TFO Moschel of the status of the package and of its delivery to Avalon at Chase Oaks Apartments at approximately 9:13 am Central Daylight Time (CDT). SEIKALY advised the package was delivered to Locker #26 located across from Building #21, which is near the Alma Dr. entrance of the apartment complex Avalon at Chase Oaks. A photo of the delivery box screen was included. The delivery box screen listed Unit 2624 with the Occupant Name **ABIMBOLA FOLARANMI**.

c) The report also stated that at approximately 09:20 am CDT, Plano Texas Police Department Detective Jerry Minton arrived in the delivery area for packages at the apartment complex Avalon at Chase Oaks. Detective Minton advised FBI TFO Moschel the apartment complex is a gated complex, and the delivery boxes are contained in an enclosed building with two entry doors. One door opens towards the parking lot, the other opens towards the pool area. The boxes are

locked and controlled electronically. FOLARANMI's apartment appears to back up to the pool area. There is a dome-covered camera in the delivery area. Detective Minton provided photos of the delivery area.

- d) The report stated that on 05/11/2021, Plano Texas Police Department Detective Minton spoke with an unidentified employee in the management office who confirmed **ABIMBOLA FOLARANMI** has been in apartment 2624 since December of 2020. He also confirmed the camera in the delivery area is operating and recorded.
- e) The report stated that on 05/12/2021, Plano Texas Police Department Detective Minton spoke with JANAY JORDAN, the property manager at Avalon at Chase Oaks (apartment complex at 801 Legacy Dr., Plano, Texas 75023), and verified video is retained for approximately 30 days. JORDAN also verified that the package lockers are owned and managed by Parcel Pending (855-316-4756).
- f) The report also stated that on 05/12/2021, FBI TFO Moschel spoke with RACHEL LNU (855-316-4756), an employee at Parcel Pending. RACHEL verified that **ABIMBOLA FOLARANMI** is a customer associated with apartment 2624 and someone picked up the FedEx packages delivered to Locker #26 at approximately 09:23 am CDT.

RACHEL also verified there are cameras on the control panel but sometimes the quality is not very good.

36. On or about May 28, 2021, **SOURCE** moved from 895 Harmon to Lake Orion, MI.

37. On 5/25/2021, **SOURCE** sent two text messages to FBI TFO Whipple stating that **SOURCE** received a 2GO card at **SOURCE**'s new address in Lake Orion from RICHARD KILEY, and that KILEY sent the PIN to the card to **SOURCE**. KILEY told **SOURCE** to withdraw \$500.00 daily from the card.

Controlled Delivery #2 FedEx Package tracking#7877 1047 5294

38. On 06/30/2021, I obtained from FBI TFO Whipple the following Report:
“Proof of delivery of FedEx package #7877 1047 5294 on 06/01/201,
drafted on 06/03/2021.

a) I reviewed the report that documented on 05/28/2021; **SOURCE** mailed a package containing \$3,500.00 cash via FedEx to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023. The package was given FedEx tracking #7877 1047 5294 and shipped via Priority Overnight. (On or about 05/25/2021, **SOURCE** was told via

text message to send the package to the address under the direction of RICHARD KILEY.)

- b) The report further stated that on 05/29/2021, FedEx attempted delivery but was unable to gain access to the delivery site.
- c) The report stated on 06/01/2021, FedEx delivered the package at approximately 08:39 am CDT and placed it in Parcel Pending locker #18. (Parcel pending, the electronic package locker service utilized by residents at the apartment complex Avalon at Chase Oaks.)
- d) Per JACK STEPHENSON of Parcel Pending, the package was retrieved from Parcel Pending locker# 18 at approximately 08:49 pm CDT. (JACK STEPHENSON is the Manager of Customer Relations at Parcel Pending.)
- e) Per video camera footage reviewed of the lobby, area/ package pickup for the apartment complex Avalon at Chase Oaks the security video is approximately 11 minutes fast. (The video camera footage was obtained via grand jury subpoena from JANAY HALTON.)
- f) The report stated that JANAY HALTON, Property Manager Avalon at Chase Oaks Apartments, reviewed security video of the person picking up the package from Parcel Pending locker #18 on 06/01/2021. HALTON immediately recognized the person picking up

the package as **ABIMBOLA FOLARANMI** and stated he was the same person who picked up the package on 05/11/2021. HALTON stated she recognized **ABIMBOLA FOLARANMI**.

- g) On 05/18/2021, FBI TFO Moschel conducted a telephonic interview of JANAY HALTON, Property Manager Avalon at Chase Oaks Apartments.
- h) On or about 06/03/2021, After the phone call with JANAY HALTON, FBI TFO Moschel reviewed the video of the FedEx package being picked up on 06/01/2021 that shows a tall black male with dark skin wearing a dark hoodie in the “up” position, dark pants, dark shoes, and carrying a black briefcase in his left hand.
- i) On 06/03/2021, FBI TFO Moschel compared the video from FEDEX package pickups on 06/01/2021 and 05/11/2021 and reported that it appears the same person picked up both packages. FBI TFO Moschel also conducted a check of the weather in the area at the time using weather underground website: www.wunderground.com that shows the temperature was approximately 71 degrees F, no rain, and wind at approximately 6mph, not resulting in a need to be wearing the hoodie in the “up” position. FBI TFO Moschel further reported that based on his training and experience such action in both videos is consistent

with someone attempting to conceal their identity from security cameras.

39. On 06/06/2021, **SOURCE** sent a text message to FBI TFO Whipple reporting RICHARD KILEY wants **SOURCE** to open a business account at JP Morgan Chase Bank to accept approximately \$600,000-\$800,000 that KILEY wants to eventually send. **SOURCE** stated that KILEY did not explain when or from where the money will come.”

40. On 06/23/2021, FBI TFO Whipple telephoned Detective Minton of Plano Police Department. FBI TFO Whipple asked if Detective Minton and members of his department could conduct surveillance on **ABIMBOLA FOLARANMI** at 801 Legacy Drive, Apartment 2624 Plano, Texas, 75023, when the third controlled delivery was scheduled to take place on 06/24/2021.

Controlled Delivery # 3 FedEx Package Tracking #2807 2204 3433

41. On 06/30/2021, I obtained from FBI TFO Whipple the following Report:

“Surveillance of **ABIMBOLA FOLARANMI** by Plano Police Department”.

- a) I reviewed the report that documented on 06/23/2021 **SOURCE** mailed a package containing \$2,800.00 cash via FedEx to STEVE

BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023. The package was given FedEx tracking #2807 2204 3433 and shipped via Priority Overnight. (On or about 06/22/2021, **SOURCE** was told via text message to send the package to the address under the direction of RICHARD KILEY.)

- b.) The report further stated that KILEY told **SOURCE** to send the package overnight to arrive on June 24, 2021 before noon.
- c.) On 06/24/2021, pursuant to a request by FBI TFO Whipple, Plano Police Department Detectives conducted surveillance on **ABIMBOLA FOLARANMI** at 801 Legacy Drive, Apartment 2624 Plano, Texas, 75023.

SURVEILLANCE CONDUCTED on 06/24/2021

42.) On 06/25/2021, Detective Minton, of Plano Police Department, sent FBI TFO Whipple a narrative report documenting the surveillance conducted on **ABIMBOLA FOLARANMI** at 801 Legacy Drive, Apartment 2624 Plano, Texas, 75023.

- a) On 06/29/2021, I obtained and reviewed from FBI TFO Whipple the narrative report documenting the surveillance conducted on

ABIMBOLA FOLARANMI at 801 Legacy Drive, Apartment 2624
Plano, Texas, 75023.

- b) According to a Plano Police Department narrative report supplied by Detective Minton. On 06/24/2021, Plano Police Detective Minton along with the following Plano Police Department members: Sergeant James Babb, Detective Chad Williams, Detective Kristi Simon, and Detective Brian Kailbourne conducted surveillance at 801 Legacy Drive, Apartment 2624 Plano, Texas, 75023.
- c) The narrative report further documented that the Plano Police surveillance team watched the Federal express truck deliver the package to the Parcel Pending package area of the apartment complex Avalon at Chase Oaks.
- d) The Plano Police surveillance crew then observed **ABIMBOLA FOLARANMI** exit his residence 801 Legacy Drive Apartment #2624 Plano, Texas, 75023, wearing an orange shirt and black shorts.
- e) **ABIMBOLA FOLARANMI** then made his way to Parcel Pending package pickup area at the apartment complex Avalon at Chase Oak's.

- f) **ABIMBOLA FOLARANMI** retrieved the Federal Express package from the locker and exited the Parcel Pending package area at the apartment complex Avalon at Chase Oak's.
 - g) Members of the Plano Police surveillance team observed **ABIMBOLA FOLARANMI** open the package, take out the contents, and throw the Federal Express envelope in a dumpster.
 - h) **ABIMBOLA FOLARANMI** then made his way back to Apartment #2624 and entered the residence.
43. Plano Police Detective Minton provided FBI TFO Whipple with the following items gathered from surveillance: A real time video that was put in the Parcel Pending package area by the surveillance team, Surveillance notes and narratives from all five Plano Police surveillance crew members involved with the surveillance conducted on 06/24/2021, Still photographs of **ABIMBOLA FOLARANMI** exiting and entering his apartment, and the torn Federal Express envelope discarded in the dumpster by **ABIMBOLA FOLARANMI**.

**TEXT MESSAGES SOURCE RECEIVED FROM “RICHARD
KILEY”**

44. On 06/25/2021, FBI TFO Whipple, obtained from **SOURCE** a copy of the text he/she received from RICHARD KILEY on 06/24/2021.

45. On 07/06/2021, FBI TFO Whipple sent DOL OIG SA Weitzel the text **SOURCE** received from RICHARD KILEY on 06/24/2021.

a) On 07/06/2021, I reviewed the text that reported on 06/24/2021 at approximately 01:15pm EDT. The person using the name RICHARD KAILEY communicated with **SOURCE** via text. The following text was sent to **SOURCE** from the person using the name RICHARD KAILEY, “You’re a beautiful woman of mine and I love you so damn much. I’ll never hurt you, I’m aware that your account was closed and you sure know that I’m not happy about it and it’s not intentional. Once again, I am sorry for all the troubles have coursed. Take it easy with me when I ask questions.”

46. On 06/25/2021, FBI TFO Whipple, obtained from **SOURCE** a copy of the text he/she received from RICHARD KILEY on 06/24/2021.

47. On 07/06/2021, FBI TFO Whipple sent DOL OIG SA Weitzel the text **SOURCE** received from RICHARD KILEY on 06/24/2021.

48. On 07/06/2021, I reviewed the text that reported on 06/24/2021 at approximately 09:30pm EDT, the person using the name RICHARD KAILEY communicated with **SOURCE** via text. The following text was sent to **SOURCE** from the person using the name RICHARD KAILEY, “I know weve been having issues with bank accounts...babe I think we need to open the company account that I told you...” “I don’t want to use the chase anymore.”

49. On 07/06/2021, I reviewed the text that reported on 06/24/2021 at approximately 10:15pm, the person using the name RICHARD KAILEY communicated with **SOURCE** via text. The following text was sent to **SOURCE** from the person using the name RICHARD KAILEY. “Think about the company account I ask you to open for me, I think that is the help you can do this time that will get me home.”

50. On 08/17/2021, I reviewed a report obtained from FBI TFO Whipple documenting telephonic contact FBI TFO Whipple had with **SOURCE** on 06/06/2021.

- a) The report documented **SOURCE** sent a text message stating that RICHARD KILEY wants **SOURCE** to open a business account at JP Morgan Chase Bank to accept approximately \$600,000-\$800,000 that

KILEY wants to eventually send. **SOURCE** stated that KILEY did not explain when or from where the money will come.

REVIEW OF APARTMENT LEASE CONTRACT FOR 801 LEGACY

51. On 07/06/2021, I reviewed the Apartment Lease Contract for Apartment 2624, 801 Legacy Drive, Plano, Texas, 75023 (Pages 1-8 of 8). These records were obtained via Grand Jury Subpoena.

a.) **ABIMBOLA FOLARANMI** is the “Lease” on the Lease Contract for Apartment #2624, 801 Legacy Drive. The initial term of the lease began on 12/5/2020 and ends at 11:59pm on 12/4/2021.

b.) The Rental Application for Residents and Occupants pages (1-4 of 4) reported the following applicant: **ABIMBOLA FOLARANMI**.

c.) The following was handwritten on the top right corner of Page 1 of 4 of the Rental Application for Residents and Occupants “transfer application to 2624”.

d.) I reviewed the Rental Application for Residents and Occupants pages (1-4 of 4) reporting **ABIMBOLA FOLARANMI** previously resided in Apartment #2118, at 801 Legacy Drive, Plano, Texas, 75023.

REVIEW OF SOURCES JP MORGAN CHASE BANK ACCOUNT
RECORDS

52. On 07/20/2021, I reviewed **SOURCE**'s JP MORGAN CHASE BANK ACCOUNT records for account ending in 1677. These records were obtained via Grand Jury Subpoena.

- a) On 05/21/2021, **SOURCE** had four direct deposits totaling \$1,976.00 from Department of Labor SWA unemployment agencies funds deposited directly into his/her CHASE BANK ACCOUNT ending in 1677.

MAIL RECEIVED FROM SOURCE CONFIRMED ADDITIONAL UI
CLAIMANT IS VICTIM OF ID THEFT

53. On 07/20/2021, at 11:17am, FBI TFO's Whipple and Moschel met with **SOURCE** at his/her place of employment in the Eastern District of Michigan.

- a.) **SOURCE** voluntarily gave FBI TFO's Whipple and Moschel mail that **SOURCE** received at his/her residence from the State of California Unemployment Agency.

- b.) One of the pieces of mail **SOURCE** received and turned over to FBI TFO's Whipple and Moschel was addressed to HENRY PEMBERTON.

c.) FBI TFO's Whipple and Moschel reported that based on their training and experience, they believed the mail was likely unemployment fraud-related, so they opened the mail at the FBI office located at 5700 Crooks RD, TROY, MI, 48098, in attempt to identify possible ID Theft victims.

54. On 07/20/2021, FBI TFO Moschel sent DOL OIG SA Weitzel copies of the mail obtained from **SOURCE** earlier in the day to include State of California Unemployment Agency mail addressed to HENRY PEMBERTON.

55. On 07/21/2021, FBI TFO Moschel telephonically interviewed HENRY PEMBERTON.

56. On 07/22/2021, FBI TFO Moschel provided DOL OIG SA Weitzel with a copy of Federal Bureau of Investigation Report for the interview conducted on 07/21/2021 with HENRY PEMBERTON.

a.) On 07/22/2021, I reviewed FBI TFO Moschel's report that documented FBI TFO Moschel's telephonic interview of HENRY PEMBERTON of Washington DC, 20011 on 07/21/2021.

b.) HENRY PEMBERTON confirmed that he never filed an unemployment claim nor had anyone file on his behalf in the State of California.

c.) HENRY PEMBERTON stated he had applied for unemployment in Virginia during the pandemic but was denied.

d.) HENRY PEMBERTON reported he has never lived in California.

e.) HENERY PEMBERTON further stated he was a victim of Identity Theft in early December of 2020 or January of 2021 when someone made unauthorized transactions involving his Navy Federal Credit Union account.

57. On 07/21/2021, I conducted a search of Department of Labor records for UI benefits claims filed with the claimant's name HENRY PEMBERTON.

58. Department of Labor records reported a total of three UI claims were filed with the claimant's name HENRY PEMBERTON.

f.) The Department of Labor records reported that two of the three UI claims for HENRY PEMBERTON were filed in Washington D.C. and Virginia using the same name, date of birth, and social security number as HENRY PEMBERTON of Washington DC, 20011.

g.) Department of Labor records reported different emails, and telephone numbers for HENRY PEMBERTON. (See insert below.)

<u>STATE</u>	<u>CLAIMANT NAME</u>	<u>CLAIMANT EMAIL</u>	<u>CLAIMANT PHONE</u>	<u>CLAIMANT TIME STAMP</u>
DC	PEMBERTON, HENRY	MIKEGREEN112233@GMAIL.COM	2026670909	May 24, 2020 12:00:00 AM
VA	PEMBERTON, HENRY	HENRYPEMBERTON23@GMAIL.COM	3369911608	April 26, 2020 11:00:00 PM

59. On 07/22/2021, FBI TFO Moschel conducted a follow up interview with HENRY PEMBERTON of Washington DC, 20011.
60. On 07/22/2021, FBI TFO Moschel provided DOL OIG SA Weitzel with a copy of Federal Bureau of Investigation Report for the interview conducted on 07/22/2021 with HENRY PEMBERTON.
61. On 07/22/2021, I reviewed FBI TFO Moschel's report that documented FBI TFO Moschel's telephonic interview of HENRY PEMBERTON of Washington DC, 20011 on 07/22/2021.
62. HENRY PEMBERTON confirmed he had applied for unemployment benefits in Virginia and Washington DC at approximately the same time. He estimated it was possibly in April 2020.
63. HENRY PEMBERTON reported he never received benefits from Virginia or Washington DC.
64. HENRY PEMBERTON stated that he has another email address, henrypemberton234@gmail.com, but no others.
65. HENRY PEMBERTON reported an address where he previously lived at in MD. However, the address is different than what DOL records showed for HENRY PEMBERTONS UI application for DC.

66. HENRY PEMBERTON reported he had a second phone number but the number was different than the one DOL records show for the UI application for DC.

67. HENRY PEMBERTON further reported that he has never had a phone number ending in 9090.

MEETING WITH SOURCE 07/22/2021

68.) On 07/22/2021, FBI TFO Moschel and I met **SOURCE** at FBI's office located at 5600 Crooks Rd, Suite 200 Troy, MI 48098.

a) **SOURCE** voluntarily presented to FBI TFO Moschel and I two sealed envelopes **SOURCE** received at his/her residence from KATHY BARNETT of 4801 WESTWAY TRL, AMARILLO, TX 79109.

SOURCE also presented two pieces of unopened US Mail, both which were from varying addresses of the State of California's Employment Development Department. Each piece of mail was sent to **SOURCE's** address in Lake Orion, Michigan. The names on the mail were JADA M. MURPHY and HENRY PEMBERTON.

b) One of the sealed envelopes was sent to **SOURCE's** residence via UPS next day air tracking #1Z RV8 527 01 5016 1493. This envelope contained \$15,000.00 in cash.

- c) The second sealed envelope was sent to **SOURCE** via FedEx tracking #2815 4058 8752. This envelope contained \$15,000.00 in cash.
 - d) FBI TFO Moschel and I counted the cash in the presence of **SOURCE** to further document the funds. FBI TFO Moschel also took photographs of the envelopes, cash and shipping labels.
 - e) **SOURCE** reported to FBI TFO Moschel and I that he/she was instructed by RICHARD KILEY to send the cash to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023, which is the address leased to **ABIMBOLA FOLARANMI**.
 - f) **SOURCE** further stated that they were instructed by RICHARD KILEY to keep \$500.00 of the \$30,000.00 to later send KILEY via BITCOIN.
 - g) **SOURCE** also stated that they would take \$100.00 of the \$30,000.00 to pay for shipping the cash to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023.
 - h) FBI TFO Moschel gave **SOURCE** \$600.00 of the \$30,000.00 in cash and placed the remaining \$29,400.00. in a sealed FedEx envelope.
- 69.) On 07/22/2021, FBI TFO Moschel and I followed **SOURCE** to FedEx store 3145 Crooks Rd, Troy, MI 48084.

a.) FBI TFO Moschel went with **SOURCE** into the FedEx store to witness **SOURCE** ship the \$29,400.00 in cash to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023.

b.) **SOURCE** did not have their Driver's License and was unable to send the \$29,400.00 in cash to STEVE BRIGGS at 801 Legacy DR. Apt. 2624, Plano, TX, 75023.

70.) On 07/22/2021, FBI TFO Moschel and I followed **SOURCE** to **SOURCE's** place of employment.

a.) **SOURCE** went inside their place of employment with the sealed FedEx envelope containing the \$29,400.00 to obtain a UPS shipping box.

b) After **SOURCE** obtained a UPS shipping box from inside their place of employment, **SOURCE** brought the sealed FedEx envelope containing the \$29,400.00 and handed it to FBI TFO Moschel to document and photograph the FedEx envelope containing the \$29,400.00 was still sealed.

c) At approximately 09:34 am FBI TFO Moschel placed the sealed FedEx envelope containing the \$29,400.00 into a UPS Express Box and sealed the UPS Express Box.

d) The UPS Express Box was sent UPS Next Day Air tracking

1Z 7R2 079 01 4174 4583 to STEVE BRIGGS 801 Legacy DR. Apt. 2624, Plano, TX, 75023.

e) FBI TFO Moschel took photographs of the UPS Express Box and Shipping label further documenting the UPS Express Box would be sent Next Day Air tracking # 1Z 7R2 079 01 4174 4583 to STEVE BRIGGS 801 Legacy DR. Apt. 2624, Plano, TX, 75023.

f) FBI TFO Moschel gave UPS Express Box back to **SOURCE** for **SOURCE** to ship out with his/her mail at work.

71.) On 07/23/2021, I conducted an online search on UPS.com to track the UPS shipment **SOURCE** sent Next Day Air with tracking # 1Z 7R2 079 01 4174 4583.

a) UPS.com reported the shipment sent Next Day Air with tracking # 1Z 7R2 079 01 4174 4583 was shipped on 07/22/2021 at approximately 03:47 pm, from Madison Heights, MI.

b) UPS.com reported that the shipment sent Next Day Air with tracking # 1Z 7R2 079 01 4174 4583 was delivered to PLANO, TX, US on 07/23/2021 at approximately 10:59 hours. (See insert below.)

Last Updated: 07/23/2021 9:47 P.M. EST

Shipment Details

Shipment Progress

07/23/2021 10:59 A.M.	Delivered PLANO, TX, US
07/23/2021 9:30 A.M.	Out for Delivery Mesquite, TX, United States
07/22/2021 3:47 P.M.	Shipped Madison Heights, MI, United States
07/22/2021 5:36 P.M.	Label Created United States

ADDITIONAL TEXT MESSAGES SOURCE RECEIVED FROM**“RICHARD KILEY”**

72.) On 09/07/2021, I met with FBI TFO Moschel at the FBI office located at 5700 Crooks RD, TROY, MI, 48098 and obtained a report dated 07/23/2021, documenting text messages **SOURCE** received on 07/20/2021 from RICHARD KAILEY.

a.) RICHARD KAILEY (616-244-8986) stated to **SOURCE**, “Good morning babe. Thanks for assuring me about the account. Babe a package will deliver today UPS tracking 1Z RV8 527 01 5016 1493.”

b.) **SOURCE** texted RICHARD KAILEY, “Where did you send it to?, which address babe? And what is the package?”

c.) RICHARD KAILEY replied, “Money babe, 15k, You will get another one tomorrow too.”

d.) **SOURCE** texted RICHARD KAILEY, “ You said there is another package too be delivered tomorrow? Does that have tracking on it?”

e.) RICHARD KAILEY replied to **SOURCE** “Yes babe it as been delivered.”

f.) **SOURCE** texted RICHARD KAILEY, “What am I to do with them once I receive them?” **SOURCE** also texted “I thought you said there is supposed to be another tomorrow? Did I misunderstand what you were saying?”

g.) RICHARD KAILEY replied, “Babe I can’t believe you ask me this yes you will get another money tomorrow. Hold on Babe let me know when you get them.”

73.) On 09/07/2021, I met with FBI TFO Moschel and obtained a report dated 08/06/2021, documenting text messages **SOURCE** received from 07/22/2021 to 08/04/2021 from RICHARD KAILEY.

a) RICHARD KAILEY (616-244-8986) texted **SOURCE** 08/01/2021, “The phone is old, everything went wrong with it. Babe can you step out to get me an itunes card during your lunch. This is the name on

the card the will deliver before the end of this week HENRY
PEMBERTON.”

b) **SOURCE** replied, “OK”

c) RICHARD KAILEY texted, “OK to What?”

d) **SOURCE** replied, “To the name on the card babe”.

74.) On 09/07/2021, I met with FBI TFO Moschel and obtained a report dated 08/31/2021, documenting text messages **SOURCE** received from 08/20/2021 to 08/29/2021 from RICHARD KAILEY.

a.) RICHARD KAILEY (616-244-8986) texted **SOURCE** 08/21/2021, “I need to go back to bed. No cards no bank opening, On Monday to Friday you’ll be busy.”

b.) **SOURCE** replied, “ I am at the store. I will send the cards. I remember the days you just needed my love. And support. I know you hate the fact that you need me. I’m sorry!!”

c.) RICHARD KAILEY replied, “I really want you to open this account for me babe.”

d.) **SOURCE** replied, “ I will babe, I have the cards.” **SOURCE** also sent screen shots of two \$50.00 Apple Gift Cards along with the Activation Status Receipt purchased from Kroger 637 on 08/21/21. **SOURCE** asked RICHARD KAILEY, “Can you read them clearly?”

e.) RICHARD KAILEY replied, “Yes babe thanks, How was your day...”

f.) **SOURCE** replied, “ It was ok. I was unable to open the account today. I have to make an appointment this week. I will try and set it up on Tuesday near work. The branch near my house only had one banker available and she was booked solid. I have never had to make an appointment to open a checking account. I did ask ab.”

g.) RICHARD KAILEY replied, “ Its alright my love, I know you’re trying to help me so hard..”

h.) **SOURCE** replied, “It will get opened this week.”

i) RICHARD KAILEY also texted **SOURCE**, “Im I too pushy about the account I want you to open.”

j.) **SOURCE** replied, “You are fine babe. When would money be deposited? Once the account is open?”

k.) RICHARD KAILY replied, “Anytime in a week or 2.”

CONSENSUAL RECORDINGS OF CONTACT BETWEEN
SOURCE AND RICHARD KILEY/KAILEY

75.) On 09/07/2021, I met with FBI TFO Moschel at the FBI office located at 5700 Crooks RD, TROY, MI, 48098 and obtained a report dated 08/11/2021

documenting that on 08/10/2021 at approximately 3:08 pm, FBI TFO Moschel received from **SOURCE** consensual recordings of contact between **SOURCE** and RICHARD KILEY covering 08/02/2021 through 08/10/2021. The recordings were received at 2200 Holland, Birmingham, Michigan and taken to the Oakland County Resident Agency.

a.) A review of the recordings by TFO Moschel revealed there were two files recorded.

b.) On Friday 08/06/2021 at 8:11 am **SOURCE** placed a call to RICHARD KILEY (RK). RK reminded **SOURCE** how **SOURCE** had promised to open an account in the past two weeks and asked **SOURCE** if an anticipated card had been received at the new address. **SOURCE** confirmed no cards had been received. RK expressed frustration over not knowing where funds would be coming from for a new contract.”

76.) On 09/07/2021, I met with FBI TFO Moschel at the FBI office located at 5700 Crooks RD, TROY, MI, 48098 and obtained a report dated 08/25/2021 documenting that on 08/24/2021 at approximately 8:35am, FBI TFO Moschel received from **SOURCE** consensual recordings of contact between **SOURCE** and RICHARD KILEY covering 08/18/2021 through 08/24/2021. The recordings were received at 6001 N Adams, Bloomfield Township, Michigan and taken to the Oakland County Resident Agency.

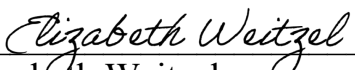
a) A review of the recordings by FBI TFO Moschel revealed there was one file recorded.

b.) On Thursday 08/19/2021 at 8:10 am RICHARD KILEY (RK) sounded depressed and told **SOURCE** he feels like a dead man living but doesn't want to stress **SOURCE** out. **SOURCE** told RK there's not much more **SOURCE** can do for RK and that attempting to open a PNC Bank account is a last-ditch effort. RK mentioned problems sending things to a P.O.X (possibly a PO Box). RK mentioned he needed three things this week or next. RK said he needs to work and can't sit around begging people for money.

CONCLUSION

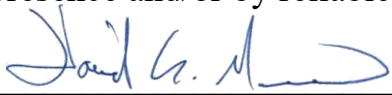
77. Based on the forgoing, there is probable cause to believe that **ABIMBOLA FOLARANMI** has committed federal crimes, including wire fraud (18 U.S.C. § 1343) mail fraud (18 U.S.C. § 1341), theft of government funds (18 U.S.C. § 641) and aggravated identity theft (18 U.S.C. § 1028A) in connection with a scheme to defraud the federal/state unemployment insurance program and obtain unemployment benefits by means of false and fraudulent pretenses and representations.

Respectfully submitted,



Elizabeth Weitzel
Special Agent
U.S. Department of Labor –
Office of Inspector General

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable David R. GRAND
United States Magistrate Judge

Date: October 16, 2021